



Extensión San Agustín, Calle 3 #1210, Río Piedras PR 00926-1837 • Tel. (787) 763-1066 • Fax (787) 763-4195 • E-mail: wapa680@gmail.com

January 25, 2017

Hon. Ajit Pai, Chairman
FEDERAL COMMUNICATIONS COMMISSION
445 12TH St., S.W.
Washington, D. C. 20554

Re: **URGENT PETITION TO STOP FCC ORDER TO SHUTDOWN AM SYNCHRONOUS BOOSTERS IN PUERTO RICO.** (LICENSE CANCELLATION TAKES EFFECT IN 3 (THREE MONTHS), MAY 7, 2017.

1800B3-TSN LICENSE CANCELLATION OF WA2XPA, WI2XSO, WI3XSO and WI2XAC.

Dear Mr. Pai:

First of all, let me congratulate you for being designated Chairman of the FCC by the President of the United States. Reading the text of your speech before the FCC employees at your inauguration as Chairman I saw my family reflected in your words.* **I am a Cuban immigrant who left Cuba in January, 1961 alone with just \$5 dollars in my pocket** just after the Cuban Regime of Castro seized my 1 kw. radio station CMAX-AM in the small town of Vinales, Cuba. I criticized the communist revolution thru my radio station and that's why I deserved the honor of being the third radio station seized by the Cuban Revolution throughout the entire island. **You can imagine all the sacrifices, and the risks I took leaving my wife and my mother at Cuba while I struggled how to arrive to the United States in search of the American Dream.** After many years of hard family work exiled in Puerto Rico, USA and being 85 years old I believed having achieved my dream of having an AM network covering the small island of Puerto Rico. I have been so thankful to the United States that when I acquired WAPA-AM in the Capital of Puerto Rico (26 years ago) I began using it to promote statehood for Puerto Rico, even the logo of the station as you can see has on it the American Flag.

My son, my wife and myself are supporters of statehood for Puerto Rico and Republicans. The only station that editorially promoted Trump for President was our network. Even when the local Republican Party supported Marcos Rubio, we supported Trump. The local coordinators of the Trump campaign can assert we are telling the truth. My wife, my son and I voted in the Republican primaries in Puerto Rico favoring Trump.

We are not millionaires, the WAPA-AM network has an income of \$800,000. (eight hundred

WAPA-680-AM San Juan	WA2XPA-680-AM Arecibo	WISO-1260-AM Ponce	WI2XSO-1260-AM Mayagüez	WI3XSO-1260-AM Aguadilla
WGYA-1590-AM Guayama		WMTI-1580-AM Morovis-Vega Baja-Manatí		

LA PODEROSA CADENA WAPA RADIO

thousand) annually. I live in a house valued less than \$100,000. We don't have BMWs, Mercedes nor Jaguars. We are dedicated engineers and AM broadcasters who believed in the challenge the FCC made to AM broadcasters to try developing AM synchronous boosters as a way to revitalize AM radio (MO&O 87-6). The FCC urged broadcasters to use multiple AM synchronous boosters to improve and or expand their coverage. Several AM broadcasters were not able to make AM synchronous boosters work. My son and I experimented for thirty years (since our first synchronous license at WMTI Manati, (booster for WMTI Morovis back in 1988.) We accepted the FCC challenge and succeeded. Ironically, the prize for our effort was receiving license cancellation letters for our three AM synchronous boosters: WA2XPA, WI2XSO, and WI3XSO, while other stations in Puerto Rico and the continental U.S. experimenting with AM synchronous boosters did not receive a cancellation letter. We don't know if the FCC is punishing us for promoting statehood, for being Republicans, for having supported Trump for President thru the airwaves, or simply for telling our story to all Americans: that AM synchronous boosters work and that they can be used to revitalize AM radio.

Never, in any of the CP's, licenses to cover, nor renewals the FCC specified the effort we made for thirty years was intended to last only 5 years. When we applied for a new booster at Guayama, the AM branch dismissed the application stating that it extended the coverage of the main station, WISO-AM. The AM branch had to accept **nowhere** in MO&O 87-6 (1987/1992) appears such restriction. Not even at that time the 5 year experimentation period was raised even when all of our existing boosters had much more than that time in operation. When we received the cancellation letters WI2XSO had 17 years on the air, WI3XSO has 14 years on the air and WA2XPA had thirteen years on the air, uninterrupted.

After asking for a reconsideration on the cancellation of WA2XPA, WI2XSO, and WI3XSO and raising the fact that we were being discriminated since another station had an AM synchronous booster in Puerto Rico and its license was not cancelled, the AM branch sent a cancellation letter to WI2XAC, 22 DAYS AFTER OUR THREE CANCELLATION LETTERS WERE ISSUED. (WI2XAC has almost 10 years on the air).

Actually, some AM stations in the Continental United States are using AM synchronous boosters and no cancellation letters have been issued to them, according to CDBS files. The best example is WBZT Pompano Bay/West Palm Beach, FL.

The Comments to Rulemaking window was initiated only after we raised in the Reconsideration Petition the issue that CP's and licenses only specify that the AM synchronous boosters are subject to the outcome of a rulemaking and not to a lifetime period of 5 years. (I requested the FCC opening a Rulemaking proceeding back in January, 2014 during the AM revitalization inquiry period.)

The Comments towards Rulemaking filed are all in favor of AM synchronous boosters. Several broadcast engineers, FCC engineering consultant firms, and the Association of FCC engineer consultants made statements favoring AM synchronous boosters. The new Governor of Puerto Rico, the previous Governor, the state Senate and House of Representatives (unanimously) and the Puerto Rico Emergency Management and Disaster Administration requested the FCC to permit WA2APA, WI2XSO, WI3XSO and WI2XAC to stay on the air stating it is in the best public interest to have these stations on the air. Since we established the WAPA radio network it has been the ONLY radio or tv station in Puerto Rico that has transmitted Presidential addresses and/or press conferences. The FCC decision to shutdown our AM synchronous boosters will impede American Citizens on the Western Part of the

Island to access our nation's President speeches thru a broadcast media, since no other broadcast media has never done that.

It must be of great concern for all American Citizens when a news/talk broadcast media is closed or its license is revoked against public interest. This broadcaster has not violated any law or rule to deserve the shutdown of his media in 1/3 of the Island. This type of actions is more common at Latin American Republics just as Cuba or Venezuela, but not in the United States. It's true we are merely a territory/colony of the U.S. but populated by 3.7 million American citizens.

Why does the FCC insist in shutting down the Puerto Rican AM SYNCHRONOUS BOOSTERS? We respectfully request a Grandfather clause to permit existing AM synchronous boosters to continue operating permanently. Although I insist that the FCC didn't grant these boosters under Part 5 (Experimental Radio Service) a waiver on par. 5.71 (license period) is requested if needed to permanently license the AM synchronous boosters actually licensed across all the United States and its territories. These boosters were granted under MO&O 87-6 (1987/92) and nowhere in it the 5 year experimental period limit was established by the FCC. The FCC authorized us a lot of CP's to change site, increase power, install directional antennas to the boosters and never said anything about a 5 year term to operate the boosters. The FCC renewed the boosters license annually and never raised the 5 year term limit issue. It is only raised when the AM branch decides to cancel the licenses.

As you shall be aware Puerto Rico is undergoing a severe economic crisis: the government can't pay its 76 billion debt, has no money to run the government, local taxes have been raised considerably, businesses are massively going bankrupt and closing, puertorican people are desperately moving to the continental United States in search of jobs. The Congress ordered a Fiscal Control Board for Puerto Rico; Puerto Rico is facing a status Plebiscite on June 2017; and the FCC has created panic among our employees and clients ordering to shutdown the signal of WA2XPA, WI2XSO, and WI3XSO by May 7, 2017. That's leaving us silent in 1/3 of the island.

IMPORTANT BRAINSTORMING:

AM SYNCHRONOUS BOOSTERS GIVES AM RADIO A REAL ADVANTAGE OVER FM STATIONS and A REAL REVITALIZATION OF THE AM BAND :

AM synchronous transmission permits having a network of two or more transmitters operating on the same frequency, synchronized in frequency and audio, making it possible to configure an AM radio network of two or more transmitters sites where the listener doesn't have to change frequencies to keep listening to that network over a largely augmented coverage area. This is an asset for AM that makes AM more valuable than ever before. FM RADIO can't do this. FM boosters can't be frequency synchronized and at the overlap area the signal vanishes into noise.

AM synchronous boosters make more people tuning AM radio. This is real AM revitalization.

Respectfully, giving an AM station a small FM translator makes people tune less the AM band. Possibly the coverage area of that translator is much less than the coverage area of the parent AM station in the case of powerful AM stations. The big AM stations will have diminished its

audience since the FCC is motivating listeners to emigrate to the FM band. Those AM stations that don't have a translator would probably don't have sufficient AM listeners either since the FCC has motivated people to tune FM radio.

I am including copy of the URGENT REQUEST to stop SHUTDOWN of WA2XPA, WI2XSO, AND WI3XSO submitted as an Addendum to the Petition for Reconsideration filed back on November, 2016. Please read it before dismissing our Petition.

As you said in your inaugural statement: "And I'm ever grateful that this wonderful country has given me and my family the opportunity to dream big." At the same time my family is deeply sad the FCC made us work very hard and reinvest our savings towards achieving the American Dream and short after the FCC destroys what we achieved as easily as a sand castle can be destroyed.

RESPECTFULLY SUBMITTED,

Wifredo G. Blanco Pi

Eng. Wifredo G. Blanco-PI, P.E.

Jorge G. Blanco Galdo

Eng. Jorge G. Blanco-Galdo, A.E.

C: President Donald Trump, Peter Doyle (Chief AM Branch)

Enclosures: Urgent Request to Stop shutdown of WA2XPA, WI2XSO and WI3XSO (addendum to petition for reconsideration filed on January 2, 2017)

*Chairman Ajit Pai remarks at inaugural speech: "I think of my parents, who came to this country 45 years ago with literally no assets other than \$10, a transistor radio, and a desire to achieve the American Dream. I think of all their sacrifices, all those risks they took, all those long hours they worked, all those moments when they must have worried about what the future would hold. None of them could ever have imagined that their grandson, their son would have the honor of being asked to lead by the President of the United States. I hope my tenure as Chairman will show me to be worthy of the sacrifices they've made for me and the lessons they've taught me. And I'm ever grateful that this wonderful country has given me and my family the opportunity to dream big.